

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)

v.)

DOMINIQUE TROUPE (aka Wop),)
ERIC RAYMOND,)
MISTI-LYN MORIN, and)
JAYME SARTELLE,)
Defendants)

Crim. No.: 5:22-CR-18-03, 01, 04, 05

THIRD SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning at an unknown time but not later than July 2021, and continuing at least through February 2, 2022, the defendants, DOMINIQUE TROUPE (aka Wop), ERIC RAYMOND, MISTI-LYN MORIN, JAYME SARTELLE and others known and unknown to the Grand Jury knowingly and willfully conspired to distribute cocaine base, a schedule II controlled substance.

With respect to defendants DOMINIQUE TROUPE and ERIC RAYMOND, their conduct as members of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(ii) & (C))

COUNT TWO

On or about February 2, 2022, in the District of Vermont, defendants, DOMINIQUE TROUPE (aka Wop) and ERIC RAYMOND, knowingly used and carried a firearm during and in relation to a drug trafficking crime for which they may be prosecuted in a Court of the United States, namely, the offense charged in Count One, and knowingly possessed a firearm in furtherance of the offense charged in Count One. During the commission of this offense the firearm was discharged.

(18 U.S.C. § 924(c)(1)(A)(iii), 18 U.S.C. § 2)

COUNT THREE

On or about February 2, 2022, in the District of Vermont, the defendants, ERIC RAYMOND and DOMINIQUE TROUPE and others known and unknown to the Grand Jury, knowingly and voluntarily agreed and conspired to unlawfully obstruct, delay, and affect commerce and the movement of articles in commerce by robbery and to commit and threaten physical violence to persons and property in furtherance of robbery, namely the unlawful taking and obtaining of personal property, drugs, and money, by means of actual or threatened force, violence, and fear of injury.

(18 U.S.C. § 1951(a))

COUNT FOUR

Beginning at an unknown time but not later than April 2021, and continuing at least through February 2, 2022, the defendant MISTI-LYN MORIN, knowingly used and maintained a place located at 361 River Street in Swanton, Vermont, for the purpose of distributing and using cocaine base, a schedule II controlled substance.

(21 U.S.C. § 856(a)(1))

COUNT FIVE

On or about February 2, 2022, in the District of Vermont, defendant ERIC RAYMOND, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime, and knowing he was ^{an (C.R.)} unlawful user of and addicted to a controlled substance as defined in 21 U.S.C. § 802, knowingly possessed a firearm, specifically an Anderson Manufacturing AM-15 rifle with serial number 20076454 which had been shipped and transported in interstate and foreign commerce.

(18 U.S.C. §§ 922(g)(1), 922(g)(3), 924(a)(2))

COUNT SIX

On or about September 7, 2022, in the District of Vermont, the defendant DOMINIQUE TROUPE (aka “Wop”, aka “Juice”) knowingly and intentionally possessed with intent to distribute cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1) & (b)(1)(C))

COUNT SEVEN

On or about July 4, 2021, in the District of Vermont, defendant MISTI-LYN MORIN, knowing she was unlawful user of and addicted to a controlled substance as defined in 21 U.S.C. § 802, knowingly possessed a firearm, specifically a Kimber, model Micro 9, 9mm semi-automatic pistol, with serial number PB0278178, which had been shipped and transported in interstate and foreign commerce.

(18 U.S.C. §§ 922(g)(3), 924(a)(2))

COUNT EIGHT

On or about June 19, 2020, in the District of Vermont, defendant MISTI-LYN MORIN, knowing she was unlawful user of and addicted to a controlled substance as defined in 21 U.S.C. § 802, knowingly possessed a firearm, specifically an Anderson Manufacturing, model AM-15, multi-caliber receiver, with serial number 20076454, assembled as a semi-automatic rifle, which had been shipped and transported in interstate and foreign commerce.

(18 U.S.C. §§ 922(g)(3), 924(a)(2))

COUNT NINE

On or about February 2, 2022, in the District of Vermont, defendant MISTI-LYN MORIN, knowing she was unlawful user of and addicted to a controlled substance as defined in 21 U.S.C. § 802, knowingly possessed a firearm, specifically a Beretta, model 85F, 9mm short (.380) semi-automatic pistol with serial number F04086Y, which had been shipped and transported in interstate and foreign commerce.

(18 U.S.C. §§ 922(g)(3), 924(a)(2))

FORFEITURE NOTICE

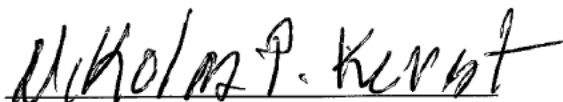
1. The allegations contained in Counts Five, Seven, Eight and Nine of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Sections 18 U.S.C. §§ 922(g)(1) or (g)(3) & 924(a)(2) as set forth in Counts Five, Seven, Eight and Nine of this Indictment, the defendants, ERIC RAYMOND and MISTI-LYN MORIN shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved or used in the knowing /willful commission of the offense, including, but not limited to: the Anderson Manufacturing AM-15 rifle with serial number 20076454; the Kimber, model Micro 9, 9mm semi-automatic pistol, with serial number PB0278178; the Beretta, model 85F, 9mm short (.380) semi-automatic pistol with serial number F04086Y.

(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

A TRUE BILL

FOREPERSON


NIKOLAS P. KEREST (MPD)
United States Attorney
Burlington, Vermont
January 24, 2023